

OCCIDENTAL CHEMICAL CORPORATION  
ADMINISTRATIVE RECORD FILE \*  
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

1. Air Contaminant Emissions Survey, 1968. P. 100001-100003.
2. Information, Firestone Waste to the Southeast Dump, Pennsylvania Form #8113, 11/18/68. P. 100004-100007. An Industrial and Agricultural Solid Waste Inventory form is attached.
3. The Firestone Tire and Rubber Company Engineering Plans for Solid Waste Disposal, 4/2/70. P. 100008-100017.
4. Letter to Mr. R.B. McClatchy, R.W. Fox Company, Inc., from W.W. Madden, re: Summary of solid waste, 2/8/71. P. 100018-100019.
5. Letter to Mr. William C. Bucciarelli, Division of Community Environmental Services, from W.W. Madden and K.P. Hochschwender, re: Program to comply with orders, 6/8/71. P. 100020-100022. A list of typical landfill items is attached.
6. Letter to Mr. W.G. Rabold from G.W. Wamsley, re: Sanitary landfill update report, 9/23/74. P. 100023-100027. A list of typical landfill items is attached.
7. Report: Report to Pennsylvania Department of Environmental Resources (PADER) on Hydrogeology of the Existing Landfill, Proposed Landfill, and Sludge Lagoons, The Firestone Tire and Rubber Company, Pottstown, Pennsylvania, prepared by Martin and Martin, Incorporated and Todd Giddings and Associates, 10/75. P. 10028-100113.
8. Memorandum to Mr. J.R. Laman and Mr. J.R. Kessler, Firestone, from G.W. Wamsley and P.J. McKenna, Firestone, re: Pottstown Chemical Plant PVC sludge, 11/6/75. P. 100114-100115.
9. Memorandum to Mr. H.S. Newman from T.C. Walker, re: Information on sanitary landfill sludge, 11/14/75.

\* Administrative Record File available 1/13/92, updated 4/19/93, 7/1/93, 7/2/93, 12/2/93, and 9/15/95.

P. 100116-100119. Information on normal and chemical waste is attached.

10. Report: Ground-Water Module Phase II, Firestone Landfill, The Firestone Tire and Rubber Company, Lower Pottsgrove Township, Montgomery County, prepared by Martin and Martin, Incorporated and Todd Giddings and Associates, 11/76. P. 100120-100155.
11. Letter to Mr. W.W. Madden, Firestone Plastics Company, from J.M. Mullen, U.S. Coast Guard, re: Discharge of oil from the Firestone Plastic Company on 12/2/76, 9/1/77. P. 100156-100161. An answered questionnaire and its cover letter are attached.
12. General information sheet on Firestone Plastics Company, Chemical Division, 1/10/78. P. 100162-100164. Two descriptions of specific waste forms are attached.
13. General information sheet on Firestone Tire and Rubber Company--Pottstown Plant, 1/10/78. P. 100165-100169. Three descriptions of specific waste forms and an FGD Sludge Disposal Site and Transport Survey are attached.
14. Interoffice memorandum from J.A. King, re: Settlement with Pennsylvania Fish Commission for the oil spill on February 11, 1978, 3/30/78. P. 100170-100181. The following are attached:
  - a) a Pennsylvania Fish Commission field receipt;
  - b) a Pollution Incident History;
  - c) a letter regarding an error in a previous letter;
  - d) a letter regarding payment for the clean water fund;
  - e) a letter regarding a written waiver of any further administrative or civil action by PADER;
  - f) a waiver;
  - g) a letter regarding payment of a civil penalty;

- h) a collection receipt.
15. Letter to Mr. Joseph A. King, Firestone Tire and Rubber Company, from N. Rao Kona, PADER, re: Agreement letter, 5/7/80. P. 100182-100219. The following are attached:
- a) an agreement letter;
  - b) a Consent Order and Agreement;
  - c) a Transmittal of Penalty Payment for the No. 13 Care Machine;
  - d) an agreement letter;
  - e) an affirmation;
  - f) a Transmittal of Penalty Payment for two machines;
  - g) a compliance history;
  - h) a letter regarding inspection sample results;
  - i) a letter regarding NPDES Permit PA 0010944 and a letter of 12/31/81;
  - j) a compliance and applicant background information form with a notarized signature;
  - k) an Occidental Chemical Corporation directors and officers list;
  - l) a Pottstown permits list;
  - m) an agreement letter;
  - n) an agreement letter;
  - o) a Transmittal of Penalty Payment form;
  - p) a Transmittal of Penalty Payment form;
  - q) a letter regarding the award of a contract.
16. Preliminary Assessment, Site No. 2, Firestone Tire and Rubber Co., Pottstown, Pennsylvania, 8/7/80. P. 100220-100245.

17. Letter to Ms. S. Bulkin, U.S. EPA, from T.C. Walker, Firestone Plastics Company, re: Notification of hazardous waste activity, 8/15/80. P. 100246-100248. An official Notification Form #8700-12 for the Pottstown site of the Firestone Tire and Rubber Company is attached.
18. General Information Form for Firestone Plastics Co., 11/14/80. P. 100249-100258. An existing environmental permits list, two site maps, and a hazardous waste permit application are attached.
19. Letter to Mr. Jay Ort, PADER, from A.E. Schmeck, Occidental Chemical Corporation, re: Occidental Chemical Corp. Landfill Annual Test Well Report - 1983, 2/11/83. P. 100259-100267. The following are attached:
  - a) two chemical analysis annual reports;
  - b) a letter regarding the results for the Landfill Quarterly Test Well Report for October 1984;
  - c) four chemical analysis quarterly reports;
  - d) a site map.
20. Report: Landfill Closure Plan for Occidental Chemical Corporation, PVC Resins Division, Pottstown, Pennsylvania, prepared by BCM Eastern Inc., 8/84. P. 100268-100334.
21. Letter to Mr. Jay Ort, PADER, from A.E. Schmeck, Occidental Chemical Corporation, re: Occidental Landfill Quarterly Test Well Report--October, 1984, 11/26/84. P. 100335-100339. Four chemical analysis quarterly reports are attached.
22. Letter to Mr. Jay Ort, PADER, from A.E. Schmeck, Occidental Chemical Corporation, re: Occidental Chemical Corporation Landfill Annual Test Well Report--1985, 2/28/85. P. 100340-100344. Four chemical analysis annual reports are attached.
23. Potential Hazardous Waste Site Tentative Disposition for Occidental Chemical, 5/10/85. P. 100345-100345.

24. Letter to Mr. Jay Ort, PADER, from A.E. Schmeck, Occidental Chemical Corporation, re: Results for the Landfill Quarterly Test Well Report--April, 1985, 5/13/85. P. 100346-100350. Four chemical analysis quarterly reports are attached.
25. Report: Application for Amendment of Permit No. 300001, Occidental Chemical Corporation, PVC Resins Division, Pottstown, Pennsylvania, prepared by BCM Eastern Inc., 6/85. P. 100351-100404.
26. Memorandum to Mr. Butch Byer, U.S. EPA, from Ms. Laura Boornazian, U.S. EPA, re: Request for assistance from Field Investigation Team (FIT) Office, 6/12/85. P. 100405-100416. A sample data summary is attached.
27. Letter to Mr. Jay Ort, PADER, from A.E. Schmeck, Occidental Chemical Corporation, re: Results for the Landfill Quarterly Test Well Report--July 1985, 8/19/85. P. 100417-100419.
28. Letter to Mr. Harold Byer, U.S. EPA, from Mr. Garth Glenn, Mr. Thomas Fromm, and Mr. Bruce R. Pluta, NUS Corporation, re: Sampling plan, 9/16/85. P. 100420-100423.
29. Report: Non-sampling Site Reconnaissance Summary Report, Occidental Chemical Corporation, prepared by NUS Corporation, 9/17/85. P. 100424-100487.
30. Municipal & Residual Waste Monitoring Initial Background Report for Occidental Chemical Corporation, 5/1/86. P. 100488-100490. A quarterly report and an initial background report required for the first year are attached.
31. Water or Waste Quality Report, 6/4/86. P. 100491-100494. Two laboratory reports and a Water or Waste Quality Report are attached.
32. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: Third quarter sampling/analyses monitoring report, 10/24/86. P. 100495-100499. The monitoring results are attached.
33. Report: Site Inspection of Occidental Chemical, prepared by NUS Corporation, 11/17/86. P. 100500-100837.

34. Well Drilling Log, 12/3/86. P. 100838-100851.
35. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: Fourth 1986 quarter sampling/analyses monitoring report, 2/4/87. P. 100852-100855. The monitoring results are attached.
36. Municipal and Residual Waste Ground Water Monitoring, Monitoring Point Number 5, 8/7/87. P. 100856-100861.
37. Municipal and Residual Waste Ground Water Monitoring, Monitoring Point Number 7, 8/7/87. P. 100862-100863.
38. Municipal and Residual Waste Ground Water Monitoring, Monitoring Point Number 8, 8/7/87. P. 100864-100865.
39. Municipal and Residual Waste Ground Water Monitoring, Monitoring Point Number 24, 8/7/87. P. 100866-100871.
40. Municipal and Residual Waste Ground Water Monitoring, Monitoring Point Number 27, 8/7/87. P. 100872-100874.
41. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation; re: Analytical test results of the sampling of flood plain monitoring wells, 8/8/87. P. 100875-100882. The test results are attached.
42. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: Third quarter analytical results, 10/28/87. P. 100883-100890. The analytical results are attached.
43. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: Fourth quarter 1987 analytical results, 12/28/87. P. 100891-100898. The analytical results are attached.
44. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: First quarter 1988 analytical results, 4/12/88. P. 100899-100906. The analytical results are attached.
45. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: Second quarter 1988 sampling test results, 7/15/88. P. 100907-100922. The test results are attached.

46. Handwritten letter to Mr. J. Ort, PADER, from J.A. King, Occidental Chemical Corporation, re: Third quarter 1988 sampling/analyses results, 10/10/88. P. 100923-100930. The test results are attached.
47. Site Inspection Photographs, (undated). P. 100931-100940.
48. Non-Sampling Site Reconnaissance Photographs, (undated). P. 100941-100952.
49. Report: Preliminary Field Trip Report for Occidental Chemical, Incorporated, Pottstown, Pennsylvania, prepared by NUS Corporation, (undated). P. 100953-100960.
50. Potential Hazardous Waste Site Identification and Preliminary Assessment, (undated). P. 100961-100967. A Field Trip Summary Report is attached.
51. Reference packet on Montgomery County Ground Water, (undated). P. 100968-101152.

## II. REMEDIAL ENFORCEMENT PLANNING

1. Letter to Mr. John J. Nevin, Firestone Tire and Rubber Company, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 2/5/87. P. 200001-200003.
2. Letter to Mr. Steven Schaefer, Occidental Chemical Corporation, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 2/5/87. P. 200004-200006.
3. Letter to Mr. F. Barba, U.S. EPA, from J.A. King, Occidental Chemical Corporation, re: U.S. EPA's concern with the Pottstown site, 2/12/87. P. 200007-200008.
4. Letter to Mr. Francisco Barba, U.S. EPA, from Mr. Stephen V. Moser, Firestone Tire and Rubber Company, re: Confirmation that Firestone has additional time to respond to information request, 2/24/87. P. 200009-200009.
5. Letter to Mr. F. Barba, U.S. EPA, from J.A. King, Occidental Chemical Corporation, re: Responses to the request for information, 3/4/87. P. 200010-200067.  
The following are attached:
  - a) statistics for disposal on the Pottstown Landfill;
  - b) landfill reports for July 1982, May 1984, and July 1986;
  - c) landfill dumpster reports for September 3, 1984-September 9, 1984; July 1, 1985-July 7, 1985; and October 27, 1986-November 2, 1986;
  - d) a letter regarding solicitation of proposal and cost estimates for transport and disposal of non-hazardous PVC waste sludge;
  - e) a letter regarding solicitation of proposal and cost quotation for transport and disposal of fly ash;
  - f) a handwritten letter regarding preparation for a permit for a new PVC sludge drying process;



- g) a deed;
  - h) a quitclaim deed;
  - i) an indenture between Philadelphia Electric Company and Firestone Tire and Rubber Company;
  - j) an indenture between Continental Band Trust Company and Firestone Tire and Rubber Company;
  - k) a quitclaim deed;
  - l) reformation of deeds for former Firestone properties.
6. Letter to Mr. F. Barba, U.S. EPA, from J.A. King, Occidental Chemical Corporation, re: Request for a copy of the NUS Non-Sampling Site Reconnaissance Summary Report, 3/10/87. P. 200068-200068.
  7. Letter to Mr. F. Barba, U.S. EPA, from J.A. King, Occidental Chemical Corporation, re: Corrections and observations to clarify the NUS Non-Sampling Site Reconnaissance Report, 3/10/87. P. 200069-200069.
  8. Letter to Mr. Francisco Barba, U.S. EPA, from Mr. Stephen V. Moser, Firestone Tire and Rubber Company, re: Response to 104(e) inquiry, 3/13/87. P. 200070-200071.
  9. Letter to Mr. J.A. King, Occidental Chemical Corporation, from Mr. Francisco Barba, U.S. EPA, re: Requested sample results, 3/17/87. P. 200072-200072.
  10. Letter to Mr. Stephen V. Moser, Firestone Tire and Rubber Company, from Mr. Bruce P. Smith, U.S. EPA, re: 104(e) request for information, 2/10/88. P. 200073-200077. A site location map and a vicinity map are attached.
  11. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Stephen V. Moser, Firestone Tire and Rubber Company, re: Firestone's documents relating to the amount and types of waste disposed of at the site, 2/26/88. P. 200078-200079.
  12. Letter to Mr. John J. Nevin, Firestone Tire and Rubber Company, from Mr. Stephen R. Wassersug, U.S. EPA, re:

Request for Firestone's participation in response action, 1/5/89. P. 200080-200085. A site location map and a list of potentially responsible parties are attached.

13. Letter to Mr. John J. Nevin, Firestone Tire and Rubber Company, from Mr. Stephen R. Wassersug, U.S. EPA, re: Request for Firestone's participation in response action, 1/5/89. P. 200086-200089. Concurrences are attached.
14. Letter to Mr. Steven Schaefer, Occidental Chemical Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Request for Occidental Chemical Corporation's participation in response action, 1/5/89. P. 200090-200097. Two certified mail receipts are attached.
15. Letter to Ms. Suzanne Billings, U.S. EPA, from Mr. Stephen V. Moser, Firestone Tire and Rubber Company, re: The declining of participation by Firestone in the Remedial Investigation/ Feasibility Study (RI/FS) for the Occidental Chemical Corporation Site, 1/19/89. P. 200098-200098.
16. Letter to Mr. Stephen V. Moser, Firestone Tire and Rubber Company, from Mr. Cecil Rodrigues, U.S. EPA, re: Response to Firestone's decline to U.S. EPA's invitation to participate in RI/FS, 2/1/89. P. 200099-200099.
17. Letter to Mr. Stephen V. Moser, Firestone Tire and Rubber Company, from Ms. Christine Chulick, U.S. EPA, re: Confirmation of pre-RI/FS scoping meeting regarding the Occidental Chemical Corporation Site, 3/30/89. P. 200100-200101. An agenda for the meeting is attached.
18. Letter to Mr. John J. Nevin, Firestone Tire and Rubber Company, from Mr. Stephen R. Wassersug, U.S. EPA, re: Good faith proposal, 5/5/89. P. 200102-200107. Two certified mail receipts are attached.
19. Letter to Mr. John J. Nevin, Firestone Tire and Rubber Company, from Mr. Stephen R. Wassersug, U.S. EPA, re: Good faith proposal, 5/5/89. P. 200108-200109.
20. Letter to Ms. Christine E. Chulick, U.S. EPA, from Mr. Paul E. Guterman, Squire, Sanders and Dempsey, re:

Response to good faith proposal, 6/29/89. P. 200110-200110.

21. Letter to Mr. Stephen V. Moser, Firestone Tire and Rubber Company, from Ms. Christine Chulick, U.S. EPA, re: Notification that Occidental Chemical Corporation has been finalized on the National Priorities List, 9/28/89. P. 200111-200111.
22. Letter to Mr. David C. Toomey, Duane, Morris and Heckscher, from Mr. Cecil Rodrigues, U.S. EPA, re: RI/FS Order, 1/3/90. P. 200112-200157. The following are attached:
  - a) an Administrative Order By Consent for RI/FS;
  - b) a contractor Safety and Hazard Communication Standard Policy;
  - c) a list of Safety Rules and Regulations for Contractors;
  - d) permit application forms;
  - e) a press release.
23. Letter to Mr. Chris Schumann, U.S. Department of Justice, from Ms. Christine Chulick, U.S. EPA, re: Signed consent order and PRP information, 1/4/90. P. 200158-200158.
24. Order Approving Consent Decree, As Amended, Civil Action No. 89-5687, 8/11/90. P. 200159-200268.

### III. REMEDIAL RESPONSE PLANNING

1. Letter to Mr. Ron Klinikowski, PADER, from Ms. Suzanne T. Billings, U.S. EPA, re: Notification of a new EPA contact for the site, 3/2/89. P. 300001-300002.
2. Memorandum to Ms. Anita Miller, Department of Interior (DOI), and Ms. Alyce Fritz, U.S. EPA, from Mr. Gregg Crystall, U.S. EPA, re: Notification of Federal Natural Resource Trustees, 3/14/89. P. 300003-300003.
3. Letter to Mr. Ron Klinikowski, PADER, from Ms. Christine Chulick, U.S. EPA, re: Confirmation of the pre-RI/FS scoping meeting, 3/30/89. P. 300004-300005. An agenda for the meeting is attached.
4. Memorandum to file from Ms. Christine Chulick, U.S. EPA, re: Minutes from the pre-RI/FS meeting, 4/17/89. P. 300006-300008. A meeting agenda and a sign in sheet are attached.
5. Telephone conversation record of Mr. Eric Schmidley, re: Grid system used for closure plans, 5/4/89. P. 300009-300009.
6. Handwritten attendance list from a site visit, 8/24/89. P. 300010-300010.
7. Telephone conversation record of Ms. Bernice Pasquini with Mr. Albert Wyda, Citizens Utility Home Water Company, re: Water distribution, 6/22/89. P. 300011-300011.
8. Telephone conversation record of Ms. Bernice Pasquini with Ms. Linda Jones, Citizens Home Utility Water Company, re: Total number of customers served by mixed ground water and surface water, 7/13/89. P. 300012-300012.
9. Memorandum to Mr. Eugene Meire, U.S. EPA, from Mr. Robert Kramer, U.S. EPA, re: Request for historical photographs, 8/29/89. P. 300013-300013.
10. Letter to Mr. Robert Kramer, U.S. EPA, from Mr. David Dodge, Bionetics Corporation, re: Historical photography, 11/21/89. P. 300014-300014.
11. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re:

Designation of a project coordinator, 1/5/90.  
P. 300015-300015.

12. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Notification of use of BCM Engineers as primary contractor, 1/15/90. P. 300016-300037. An information package on BCM Engineers is attached.
13. Letter to Ms. Anita Duffy, PADER, from Ms. Christine Chulick, U.S. EPA, re: Notice of submission date for the draft RI/FS Work Plan, 1/16/90. P. 300038-300038.
14. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Comments on the scope of work, 1/18/90. P. 300039-300041.
15. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corp., re: Swale sediment sampling, 1/31/91. P. 300042-300045. A memorandum regarding slides, a photograph description list, and a site map are attached.
16. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Transmittal of the RI/FS, photographs, and response to comments, 2/2/90. P. 300046-300049. Responses to EPA comments on the scope of work are attached.
17. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Ms. Diann Sims, U.S. EPA, re: Performance evaluation samples, 2/13/90. P. 300050-300050.
18. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Roy Blickwedel, BCM Engineers, re: Performance evaluation samples, 2/14/90. P. 300051-300051.
19. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Ms. Diane Simms [sic], U.S. EPA, re: Transmittal of performance evaluation samples, 2/21/90. P. 300052-300052.
20. PADER's Comments on RI/FS Work Plan, 3/8/90. P. 300053-300056.

21. BCM Engineers' response to EPA's comments on RI/FS Work Plan, 4/27/90. P. 300057-300069.
22. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: EPA's comments on the RI/FS Work Plan, 4/27/90. P. 300070-300104. The following are attached:
  - a) EPA's comments;
  - b) inorganic contaminants table;
  - c) drinking water regulations and health regulations information;
  - d) an article entitled "Capture-Zone Type Curves: A Tool for Aquifer Cleanup";
  - e) a site map;
  - f) Surface Water and Sediment Investigation: Chemical/Physical Parameters.
23. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Request to implement sampling programs for the RI, 5/10/90. P. 300105-300105.
24. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Mike Kargatis, Occidental Chemical Corporation, re: Performance evaluation samples analyzed by Radion, 5/10/90. P. 300106-300106.
25. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. James McGaerghy, Radion Corporation, re: Receipt of performance evaluation samples, 5/11/90. P. 300107-300107.
26. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Ms. Diann Sims, U.S. EPA, re: Inorganic performance evaluation samples for Radion, 5/14/90. P. 300108-300108.
27. Letter to Ms. Diann Sims, U.S. EPA, from Ms. Christine Chulick, U.S. EPA, re: Work Plan and Sampling Analysis Plan for lagoon sampling, 5/15/90. P. 300109-300109.

28. Memorandum to Ms. Christine Chulick, U.S. EPA, from Ms. Diann Sims, U.S. EPA, re: Review of the Sampling Analysis Plan and Site Operations Plan, 5/21/90. P. 300110-300110.
29. Letter to Mr. Alan F. Weston Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Response concerning the RI/FS Work Plan, 5/21/90. P. 300111-300114. A site map and an RI/FS schedule are attached.
30. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Eric Schmidley, BCM Engineers, re: Drilling of well TB-3, 5/22/90. P. 300115-300115.
31. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Bruce Beach, Dynamac Corporation, re: Review of Sampling Plan, 5/23/90. P. 300116-300119. A letter regarding the review is attached.
32. Memorandum to Ms. Christine Chulick, U.S. EPA, from Ms. Diann Sims, U.S. EPA, re: Analysis of performance evaluation samples, 6/13/90. P. 300120-300120.
33. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Revised RI/FS Work Plan, 6/14/90. P. 300121-300123.
34. Letter to Ms. Anita Duffy, PADER, from Ms. Christine Chulick, U.S. EPA, re: Documents for review, 6/15/90. P. 300124-300124.
35. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Anthony J. Vellios, Dynamac Corporation, re: Comments on the RI/FS Work Plan, 6/20/90. P. 300125-300125.
36. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Answers to questions about the RI/FS, 6/21/90. P. 300126-300129. A schedule of activities is attached.
37. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Concerns about the RI/FS, 6/22/90. P. 300130-300130.

38. Report: Sampling Plan for Inactive Earthen Lagoons at Occidental Chemical Corporation, prepared by BCM Engineers, 6/22/90. P. 300131-300226. A cover letter is attached.
39. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Dan Erdman, BCM Engineers, re: Approval of packer test intervals for well TB-3, 6/29/90. P. 300227-300227.
40. Letter to Ms. Diann Sims, U.S. EPA, from Ms. Christine Chulick, U.S. EPA, re: Comments on the Lagoon Sampling Plan, 6/29/90. P. 300228-300228.
41. Memorandum to file from Ms. Christine Chulick, U.S. EPA, re: Approval of geophysical logging, camera surveying, and packer test intervals, 7/2/90. P. 300229-300229.
42. Report: Inactive Earthen Lagoon/Sampling Plan, Health and Safety Plan, prepared by BCM Engineers, 7/5/90. P. 300230-300295. A cover letter is attached.
43. Memorandum to Ms. Christine Chulick, U.S. EPA, from Ms. Diann Sims, U.S. EPA, re: Review of the Lagoon Sampling Analysis Plan, 7/9/90. P. 300296-300296.
44. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Dan Erdman, BCM Engineers, re: Completion of drilling well TB-3, 7/9/90. P. 300297-300297.
45. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Approval of the Lagoon Sampling Plan, 7/11/90. P. 300298-300298.
46. Memorandum to Ms. Christine Chulick, U.S. EPA, from Ms. Diann Sims, U.S. EPA, re: Review of Quality Assurance (QA) documents, 7/16/90. P. 300299-300315. The review is attached.
47. Letter to Ms. Christine Chulick, U.S. EPA, from Ms. Anita Louise Duffy, PADER, re: Notification of new project officer, 7/17/90. P. 300316-300316.
48. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re:



Sampling of inactive earthen lagoons, 7/23/90.  
P. 300317-300317.

49. Memorandum to Ms. Christine Chulick, U.S. EPA, from Mr. Thomas Sheehan, PADER, re: Review of the RI/FS Work Plan, 8/7/90. P. 300318-300320.
50. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Eric Schmidley, BCM Engineers, re: Split samples from inactive lagoons, 8/10/90. P. 300321-300321.
51. Report: Monthly Field Trip Report, prepared by Dynamac Corporation, 8/10/90. P. 300322-300339. A cover letter and handwritten field notes are attached.
52. Memorandum to Ms. Christine Chulick, U.S. EPA, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Photograph log from oversight activities, 8/13/90. P. 300340-300351. The photographs are attached.
53. Telephone conversation record of Ms. Annette Lage, U.S. EPA, with Ms. Robin Douglas, Clayton Environmental Consultants, re: Sample analysis, 8/14/90. P. 300352-300352.
54. Telephone conversation record of Ms. Robin Douglas Clayton, Environmental Consultants, with Mr. David Mack, U.S. EPA, re: Water sample, 8/14/90. P. 300353-300353.
55. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Bruce Beach, Dynamac Corporation, re: Summary of the PRP's RI/FS work occurring at the Occidental Chemical Corporation Site from 8/6/90 to 8/9/90, 8/15/90. P. 300354-300359. The oversight memorandum from B&V Waste Science and Technology Corporation is attached.
56. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Daniel E. Erdman and Mr. Eric B. Schmidley, BCM Engineers, re: Shipment of samples, 8/16/90. P. 300360-300360.
57. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: EPA comments on the second draft RI/FS Work Plan, 8/24/90. P. 300361-300414. The following are attached:

- a) EPA comments;
  - b) a memorandum regarding clean-up levels for lead in ground water;
  - c) Region III Modifications to the Organic Functional Guidelines, 6/88;
  - d) Region III Modifications to the Organic Functional Guidelines, 7/90;
  - e) RI/FS schedule;
  - f) well completion specifications;
  - g) Quality Assurance Project Plan review.
58. Letter to Mr. Thomas Sheehan, PADER, from Ms. Christine Chulick, U.S. EPA, re: Comments on the RI/FS Work Plan, 8/27/90. P. 300415-300415.
  59. Letter to Mr. Thomas Sheehan, PADER, from Ms. Christine Chulick, U.S. EPA, re: Information concerning Occidental Chemical Corporation, 8/30/90. P. 300416-300416.
  60. Memorandum to file from Ms. Christine Chulick, U.S. EPA, re: Groating of central boring in lagoon 2, 8/30/90. P. 300417-300417.
  61. Letter to Ms. Cynthia Steele, U.S. EPA, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Closure of underground storage tanks, 9/14/90. P. 300418-300427. A bid information list, a handwritten memorandum, and scope of work information are attached.
  62. Telephone conversation record of Ms. Annette Lage, U.S. EPA, with Ms. Carol Shaeffer, Coors Analytical Lab, re: Chain of custody records and inorganic traffic reports, 9/19/90. P. 300428-300428.
  63. Letter to Mr. Daniel Erdman, BCM Engineers, from Ms. Christine Chulick, U.S. EPA, re: Comments on the RI/FS Work Plan, 9/19/90. P. 300429-300434. Information on Apparent Effects Threshold (AET) and a Puget Sound AET table are attached.
  64. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re:

Revised RI/FS Work Plan, Field Sampling Plan, and Quality Assurance Project Plan, 10/10/90. P. 300435-300456. Comments on the revised plans are attached.

65. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Concerns about well development and project schedule, 10/26/90. P. 300457-300459. An RI/FS schedule is attached.
66. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Approval of various plans, 10/30/90. P. 300460-300461.
67. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Conditions pending approval of the RI/FS Work Plan, 10/31/90. P. 300462-300462.
68. Report: Remedial Investigation/Feasibility Study, Final Work Plan, prepared by BCM Engineers, 11/90. P. 300463-300617.
69. Report: Remedial Investigation/Feasibility Study, Final Work Plan, Appendices, prepared by BCM Engineers, 11/90. P. 300618-301213.
70. Report: Remedial Investigation/Feasibility Study, Final Health and Safety Plan, prepared by BCM Engineers, 11/90. P. 301214-301286.
71. Report: Remedial Investigation/Feasibility Study Final Field Sampling Plan, prepared by BCM Engineers, 11/90. P. 301287-301372.
72. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Transmittal of various plans, 11/12/90. P. 301373-301373.
73. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Company, re: RI activities schedule, 11/14/90. P. 301374-301375.
74. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, re: Review of the final RI/FS Work Plan, 11/19/90. P. 301376-301376.

75. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Daniel E. Erdman, BCM Engineers, re: Request for performance evaluation samples, 11/21/90. P. 301377-301377.
76. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Ms. Diann Sims, U.S. EPA, re: Request for BCM to perform sample analyses, 11/21/90. P. 301378-301378.
77. Memorandum to Ms. Diann Sims, U.S. EPA, from Ms. Christine Chulick, U.S. EPA, re: Performance evaluation sample for BCM laboratory, 11/21/90. P. 301379-301379.
78. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Company, re: Revised pages of the Work Plan and Quality Assurance Project Plan, 11/28/90. P. 301380-301380.
79. Letter to Mr. Alan Robinson, BCM Laboratory, from Ms. Diann Sims, U.S. EPA, re: Information for conducting performance evaluation sample analysis, 11/29/90. P. 301381-301381.
80. Handwritten RI/FS field work notes, author Christine Chulick, U.S. EPA, 11/30/90 to 2/7/91. P. 301382-301388.
81. Photograph log, 11/30/90. P. 301389-301393. A site map and handwritten notes are attached.
82. Telephone conversation record of MRD, B&V Waste Science and Technology Corporation, with Mr. Dan Erdman, BCM Engineers, re: Sampling schedule, 12/4/90. P. 301394-301395.
83. Letter to Ms. Marcella Stoltz, PADER, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Sample analysis results, 12/5/90. P. 301396-301403. Analytical report results and a site map are attached.
84. Letter to Ms. Colleen K. Walling, U.S. EPA, from Mr. Steven Hooper, B&V Waste Science and Technology Corporation, re: Request for Special Analytical

- Services (SAS), 12/7/90. P. 301404-301422. An SAS regional request is attached.
85. Telephone conversation record of MRD, B&V Waste Science and Technology Corporation, with Mr. D. Erdman, BCM Engineers, re: Progress of field work, 12/7/90. P. 301423-301423.
  86. Report: Final Oversight Sampling Plan, prepared by Dynamac Corporation, 12/7/90. P. 301424-301458.
  87. Letter to Ms. Colleen K. Walling, U.S. EPA, from Mr. Steven Hooper, B&V Waste Science and Technology Corporation, re: Request for SAS, 12/11/90. P. 301459-301470. An SAS regional request is attached.
  88. Report: Remedial Investigation/Feasibility Study, Final Quality Assurance Project Plan, Addendum to Attachment 5 (Quality Assurance Manual/Laboratory Analytical Methods) To Approved November 1990 QAPP, prepared by BCM Engineers, 1/91. P. 301471-302122.
  89. Letter to Ms. Marcella Stoltz, PADER, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Sample analysis results, 1/4/91. P. 302123-302132. A soil analysis table, a site map, and analytical report results are attached.
  90. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Soil vapor survey, 1/9/91. P. 302133-302134.
  91. Memorandum to Ms. Christine Chulick, U.S. EPA, from Mr. Dan Erdman, BCM Engineers, re: Sampling locations, 1/18/91. P. 302135-302136. A proposed sample location map is attached.
  92. Telephone conversation record of Ms. Colleen K. Walling and J. Snyder with Mr. Robert Finlay, ITPA Laboratory, re: Quality control samples, 1/21/91. P. 302137-302137.
  93. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. David C. Kennedy, PADER, re: State Applicable or Relevant and Appropriate Requirements (ARAR's), 1/31/91. P. 302138-302140.

94. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Summary of sampling for the Schuylkill River and the Closed Landfill Stormwater Sewer Outfall at the Occidental Chemical Corporation Site for 12/18/90, 12/27/90, and 1/17/91, 1/31/91. P. 302141-302144.
95. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Swale sediment sampling, 1/31/91. P. 302145-302145.
96. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Summary of the PRP's Borrow Area sampling effort and the sampling of the Closed Landfill Stormwater Sewer Outfall at the Occidental Chemical Corporation Site on 1/15/91, 1/31/91. P. 302146-302149. A hand-drawn sketch of the site and notes are attached.
97. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Background soil sampling, 1/31/91. P. 302150-302151.
98. Telephone conversation record of Ms. Judy Snyder and C. Walling with Ms. Susan McCarty and Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Indication for pest/PCB analysis to be required, 2/5/91. P. 302152-302152.
99. Telephone conversation record of Ms. Christine E. Chulick U.S. EPA, with Mr. Alan Weston, Occidental Chemical Corporation, re: Air release and evacuation, 2/6/91. P. 302153-302153.
100. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Progress Report No. 3, 2/7/91. P. 302154-302165. The following are attached:
  - a) an RI/FS schedule;
  - b) a borehole drilling program status table;
  - c) a soil vapor survey;
  - d) two site maps.

101. Memorandum to Ms. Christine Chulick, U.S. EPA, from Mr. Dan Erdman and Mr. Eric Schmidley, Occidental Chemical Corporation, re: Review of intervals, 2/8/91. P. 302166-302166. Intervals information is attached.
102. Telephone conversation record of Ms. Colleen K. Walling and J. Snyder, with Ms. Mary Anne Babich, Key PA, re: Correction of an error, 2/8/91. P. 302167-302168. A previous record of telephone conversation is attached.
103. Report: Field Quality Assurance Audit, prepared by Occidental Chemical Corporation, 2/15/91. P. 302169-302182. A transmittal letter is attached.
104. Inorganic Data Validation, Case 15627, prepared by Weston, 2/25/91. P. 302183-302198. A cover memorandum is attached.
105. Organic Data Validation, Case 15627, prepared by Weston, 2/26/91. P. 302199-302249. A cover memorandum is attached.
106. Memorandum to Ms. Christine Chulick, U.S. EPA, from Mr. Joseph L. Slayton, U.S. EPA, re: Hardness report, 3/5/91. P. 302250-302252. A memorandum regarding hardness and a chain of custody record are attached.
107. Progress Report No. 4, prepared by Occidental Chemical Corporation, 3/7/91. P. 302253-302285. The following are attached:
  - a) a RI/FS schedule;
  - b) the status of borehole drilling table;
  - c) twelve packer test interval tables;
  - d) a Quality Assurance Field Audit.
108. Data Validation Report, Inorganics, Case 14664, prepared by B&V Waste Science and Technology Corporation, 3/11/91. P. 302286-302309. A cover letter and a memorandum are attached.
109. Letter to Ms. Marcella Stoltz, PADER, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Underground storage removal project, 3/12/91. P. 302310-302316. Two site maps, an analytical report, and a chain of custody record are attached.
110. Telephone conversation record of Ms. Christine E. Chulick, U.S. EPA, with Mr. Dan Erdman, BCM Engineers,

re: Stopping of drilling at well TB-2, 3/14/91.  
P. 302317-302317.

111. Memorandum to Mr. Camille Costa, Dynamac Corporation, from Mr. Mark D'Andrea, B&V Waste Science and Technology Corporation, re: Downhole camera and geophysics work, 3/15/91. P. 302318-302319.
112. Letter to Ms. Joan Komarek, BCM Laboratory, from Ms. Diann Sims, U.S. EPA, re: Scoring results for performance evaluation samples, 3/15/91. P. 302320-302323. Lab sample results are attached.
113. Telephone conversation record of J. Snyder and Ms. Colleen K. Walling, U.S. EPA, with Ceimic Laboratory and ITPA Laboratory, re: Inorganic and organic samples, 3/18/91. P. 302324-302324.
114. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: New completion depth for borehole TB-2, 3/19/91. P. 302325-302326.
115. Telephone conversation record of Ms. Christine E. Chulick, U.S. EPA, with Mr. Bob Schuster and Mr. Alan Weston, Occidental Chemical Corporation, re: Delay of the sampling plan, 3/20/91. P. 302327-302327.
116. Letter to Mr. Camille Costa, Dynamac Corporation, from Mr. Christopher W. Beetham, B&V Waste Science and Technology Corporation, re: Soil sampling, 3/22/91. P. 302328-302329.
117. Telephone conversation record of Ms. Colleen K. Walling and J. Snyder, U.S. EPA, with Mr. Chris Sheldon, Ceimic Laboratory, re: Soil sampling, 3/26/91. P. 302330-302330.
118. Data Validation Report Case #14660, Organics, Occidental Chemical Corporation, prepared by B&V Waste Science and Technology Corp., 3/26/91. P. 302331-302388. A transmittal letter and memorandum are attached.
119. Letter to Mr. Mike Ellickson [sic], U.S. EPA, from Mr. Camille Costa, Dynamac Corporation, re: Data validation reports, 3/29/91. P. 302389-302389.



120. VOC Analysis of Occidental Chemical Corporation, Superfund Enforcement (TGB03NP59), (2/15/91 - 3/6/91), 910211-01-07; 910214-01-04, prepared by U.S. EPA, 4/3/91. P. 302390-302399. Two transmittal memorandums are attached.
121. Letter to Mr. Robert S. Schuster, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Comments on underground storage tank sampling plan, 4/4/91. P. 302400-302400.
122. Telephone conversation record of Mr. Bob Schuster, Occidental Chemical Corporation, re: Empty underground storage tanks removed, 4/4/91. P. 302401-302401.
123. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Donald Becker, PADER, re: Address change, 4/5/91. P. 302402-302402.
124. Progress Report No. 5, prepared by Occidental Chemical Corporation, 4/9/91. P. 302403-302412. An RI/FS schedule, a borehole drilling status table, and packer test intervals are attached.
125. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Dan Erdman, BCM Engineers, re: Problems with fieldwork, 4/9/91. P. 302413-302413.
126. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Underground storage tank removal, 4/10/91. P. 302414-302415.
127. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Revised schedule, 4/15/91. P. 302416-302418. A certified mail receipt is attached.
128. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Revised proposed addendum, 4/15/91. P. 302419-302420.
129. Data review worksheets, 4/22/91. P. 302421-302451.
130. Letter to Ms. Diann Sims, U.S. EPA, from Ms. Darline F. Terrell and Ting-Ting Chang, Dynamac Corporation, re: Organic analyses of soil and water samples, 4/26/91. P. 302452-302488. The following are attached:

- a) a glossary of organic and inorganic data qualifier codes;
  - b) fifteen data summary forms;
  - c) a telephone log;
  - d) a facsimile transmittal form;
  - e) a sampling plan summary;
  - f) a facsimile transmittal form;
  - g) a memorandum regarding background soil sampling;
  - h) a memorandum regarding sewer sampling.
131. Report: Remedial Investigation/Feasibility Study Interim Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, prepared by BCM Engineers, 5/91. P. 302489-302870.
132. Letter to Ms. Marcella Stoltz, PADER, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Boring results, 5/8/91. P. 302871-302886. A site map and analytical report results are attached.
133. Progress Report No. 6, prepared by Occidental Chemical Corporation, 5/9/91. P. 302887-302892. An RI/FS schedule and packer testing intervals are attached.
134. Telephone conversation record of Ms. Christine E. Chulick U.S. EPA, with Mr. Bob Schuster, Occidental Chemical Corporation, re: Underground storage tank sampling, 5/15/91. P. 302893-302893.
135. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Transmittal of the interim report, 5/17/91. P. 302894-302894.
136. Summary of conclusions of meeting, 5/29/91. P. 302895-302897.
137. Memorandum to file from Ms. Christine Chulick, U.S. EPA, re: Interim meeting, 5/31/91. P. 302898-302900.

138. Report: Phase III Soil Vapor Survey Report, prepared by BCM Engineers, 6/91. P. 302901-302927.
139. Report: Data Validation for Occidental Chemical Plant, Pottstown, Pennsylvania Site, Organic Data: Volatile and Semivolatiles, prepared by Trillium, Incorporated, 6/7/91. P. 302928-303175.
140. Progress Report No. 7--Activities of May 1991, prepared by Occidental Chemical Corporation, 6/10/91. P. 303176-303180. Table 1--Monitoring Well Completion Specifications and Table 2--Percent Complete of RI/FS Schedule Activities are attached.
141. Letter to Mr. Robert L. Allen, U.S. EPA, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Request for waiver of ground water requirements, 6/10/91. P. 303181-303186. A well location map and a letter regarding variance from ground water monitoring are attached.
142. Letter to Ms. Marcella Stoltz, PADER, from Mr. Robert Schuster, Occidental Chemical Corporation, re: Analytical results and sketches from borings along underground pipelines, 6/11/91. P. 303187-303250. The following are attached:
- a) a hand-drawn map of the #4 tank field;
  - b) analytical reports for sample numbers 1018176-1018187;
  - c) analytical reports for sample numbers 1018194-1018199;
  - d) a hand-drawn map of the gasoline tank field;
  - e) analytical reports for sample numbers 1017953-1017958;
  - f) a sketch of soil boring locations along pipelines;
  - g) analytical reports for sample numbers 101835-101844;
  - h) analytical reports for sample numbers 1017966-1017967.

143. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Summary of the monitoring well completion depths first round ground water sampling and off-site well survey, 6/11/91. P. 303251-303257. Table 1--Monitoring Well Completion Specifications and Table 2--Monitoring Wells for Groundwater Sampling are attached.
144. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Eric Schmidley, BCM Engineers, re: Grouting of holes before constructing wells, 6/12/91. P. 303258-303258.
145. Memorandum to Ms. Nancy Cichowicz, U.S. EPA, from Ms. Christine Chulick, U.S. EPA, re: Transmittal of recommendations for first round ground water sampling locations, 6/12/91. P. 303259-303259.
146. Letter to Ms. Colleen K. Walling, U.S. EPA, from Ms. Catherine H. Drazkowski, B&V Waste Science and Technology Corporation, re: Transmittal of a Special Analytical Services request for review, 6/14/91. P. 303260-303294. The request is attached.
147. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Camille Costa, Dynamac Corporation, re: Transmittal of data summary forms for case #15985 SDG CCB45, #15588 SDG CAU85, #15700 SDGs MCEE03 and CCB16, and #15985 SDG MCEE41, 6/17/91. P. 303295-303361. The data summary forms, two letters, and a memorandum are attached.
148. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Grouting of wells, 6/17/91. P. 303362-303362.
149. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Transmittal of the Phase II Soil Vapor Survey Report, 6/17/91. P. 303363-303363.
150. Letter to Mr. Robert S. Schuster, Occidental Chemical Corporation, from Ms. Marcella Stoltz, PADER, re: Review of proposed actions for the storage tank program, 7/1/91. P. 303364-303364.
151. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Eric Schmidley, BCM Engineers, re: Proposed soil boring program, 7/1/91. P. 303365-303365.

152. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Eric Schmidley, BCM Engineers, re: Drilling and packer testing, 7/2/91. P. 303366-303366.
153. Telephone conversation record of Mr. J. Fairchild, B&V Waste Science and Technology Corp., with Mr. Eric Schmidley, BCM Engineers, re: Packer test intervals for Occidental Chemical boring TB-3, 7/3/91. P. 303367-303368. A cover letter is attached.
154. Letter to Mr. Robert S. Schuster, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Reporting and approval requirements, 7/8/91. P. 303369-303369.
155. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Responses to EPA's comments on the proposed contingent soil boring program, 7/8/91. P. 303370-303373. Table 2 - Monitoring Wells for Groundwater Sampling is attached.
156. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Christine Chulick, U.S. EPA, re: Decisions made on the proposed monitoring well network and sampling analysis plan, 7/8/91. P. 303374-303374.
157. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Robert S. Schuster, Occidental Chemical Corporation, re: Off-site removal of the soil from the gasoline tank field, 7/9/91. P. 303375-303388. The following are attached:
  - a) a PADER notification to dispose of contained soil;
  - b) a gasoline tank excavation map;
  - c) a site plan;
  - d) analytical reports for sample numbers 1008606-1008609;
  - e) a waste characterization report.
158. Progress Report No. 8--Activities of June 1991, prepared by Occidental Chemical Corporation, 7/9/91. P. 303389-303472.

159. Memorandum to file from Ms. Christine Chulick, U.S. EPA, re: Summary of July 16th meeting at Occidental Chemical, 7/22/91. P. 303473-303475. A sketch of the effluent pre-treatment system and a proposed schedule are attached.
160. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Transmittal of results of the well record search, 7/23/91. P. 303476-303481. An inventory of wells is attached.
161. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Modification to the ground water analytical program, 7/24/91. P. 303482-303484. Table 2--Monitoring Wells for Groundwater Sampling is attached.
162. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Ms. Nancy Cichowicz, U.S. EPA, re: Necessity of residential well sampling, 7/30/91. P. 303485-303485.
163. Telephone conversation record of Ms. Christine Chulick, U.S. EPA, with Mr. Eric Schmidley, BCM Engineers, re: Approval of BCM's proposed well screen locations, 8/2/91. P. 303486-303486.
164. Progress Report No. 9--Activities of July 1991, 8/10/91. P. 303487-303498. The following are attached:
- a) Table 1--Groundwater Monitoring Wells Sampled for Round 1 Parameters;
  - b) Table 2--Contingent Soil Boring and Sampling Program Summary;
  - c) Table 3--Borehole TB-3 Well Completion Specifications;
  - d) Table 4--Status of Reconnaissance Borehole and Additional Borehole Well Completion as of End of July 1991;
  - e) Table 5--Percent Complete of RI/FS Schedule Activities;

- f) Attachment 1--TB-1 Analytical Results and Well Completion Specifications.
165. Letter to Mr. H. Lee, U.S. EPA, from J.W. Lessig, Occidental Chemical Corporation, re: Resource Conservation and Recovery Act (RCRA) Part B Permit Application, 8/27/91. P. 303499-303499.
166. RCRA Generator Certification, 8/28/91. P. 303500-303504. An analytical report is attached.
167. Letter to Mr. Robert S. Schuster, Occidental Chemical Corporation, from Mr. Robert L. Allen, U.S. EPA, re: Compliance with the RI/FS ground water monitoring requirements, 8/30/91. P. 303505-303505.
168. Report: Surface Impoundments Part B Permit Application for Concrete Settling Basins and Lined Lagoons, Volume 1, prepared by BCM Engineers, 9/91. P. 303506-303704.
169. Report: Surface Impoundments Part B Permit Application for Concrete Settling Basins and Lined Lagoons, Volume 2, prepared by BCM Engineers, 9/91. P. 303705-303854.
170. Progress Report No. 10--Activities of August 1991, prepared by Occidental Chemical Corporation, 9/10/91. P. 303855-304117.
171. Memorandum to Ms. Christine Chulick, U.S. EPA, from Mr. Frederick Dreisch, U.S. EPA, re: Transmittal of analytical reports, 10/18/91. P. 304118-304178. The analytical reports are attached.
172. Preliminary Table 1--Earthen Lagoon Number 1, Summary of TCLP, TCL, and TAL Analyses, (undated). P. 304179-304185.
173. Record of telephone conversation of Ms. Christine Chulick, U.S. EPA, with Mr. Alan Weston, Occidental Chemical Corporation, re: Request for expedited sampling of earthen lagoons, (undated). P. 304186-304186.
174. Figure 1--Water Well Inventory, (undated). P. 304187-304187.
175. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown,

Pennsylvania, prepared by BCM Engineers, 3/93.  
P. 304188-304521.

176. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix A Through E, prepared by BCM Engineers, 3/93. P. 304522-304793.
177. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix F Through J, prepared by BCM Engineers, 3/93. P. 304794-304946.
178. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix K, prepared by BCM Engineers, 3/93. P. 304947-305181.
179. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix L, Volume 1, Data Validation Reports, Goundwater Sample TB-1, prepared by BCM Engineers, 3/93. P. 305182-305659.
180. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix L, Volume 2, Data Validation Reports, Groundwater Sample TB-2, prepared by BCM Engineers, 3/93. P. 305660-306266.
181. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix L, Volume 3, Data Validation Reports, Surface Water Sample SR-3-SW, prepared by BCM Engineers, 3/93. P. 306267-306638.
182. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix L, Volume 4, Data Validation Reports, Lined Lagoon Soil Sample LL1S-6, prepared by BCM Engineers, 3/93. P. 306639-307122.
183. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix L, Volume 5, Data Validation Reports, Drainage Swale Sediment Sample SW-8-SED, prepared by BCM Engineers, 3/93. P. 307123-307571.



184. Report: Final Remedial Investigation Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, Appendix M, Human Health and Environmental Risk Assessment, prepared by BCM Engineers, 3/93. P. 307572-307799.
185. Report: Final Feasibility Study Report, Occidental Chemical Corporation, Pottstown, Pennsylvania, prepared by BCM Engineers, 3/93. P. 307800-308000.
186. Report: Occidental Chemical Corporation, Pottstown, Pennsylvania, Modeling of Potential Groundwater Recovery Scenarios, Appendix A to Feasibility Study Report, prepared by BCM Engineers, 3/93. P. 308001-308070.
187. Report: Preliminary Health Assessment for Occidental Chemical Corporation Site, prepared by U.S. Department of Health and Human Services (DHHS), 6/24/90. P. 308071-308084.
188. Letter to Ms. Chulick, U.S. EPA, from Mr. Dave Kennedy, PADER, re: Comments on Draft Remedial Investigation Report, 4/29/92. P. 308085-308086.
189. Memorandum to Mr. Anthony Dappolone, U.S. EPA, from Mr. Joseph W. Kunz, U.S. EPA, re: Review of Remedial Investigation Report, 5/8/92. P. 308087-308087.
190. Letter to Ms. Christine Chulick, U.S. EPA, from Mr. Dave Kennedy, PADER, re: Comments on Draft Feasibility Study Report, 7/10/92. P. 308088-308089.
191. Letter to Mr. David C. Kennedy, PADER, from Ms. Linda Dietz, U.S. EPA, re: Request for state Applicable or Relevant and Appropriate Requirements (ARARs), 2/3/93. P. 308090-308091.
192. Progress Report No. 27--Activities of January 1993, prepared by Occidental Chemical Corporation, 2/11/93. P. 308092-308102.
193. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Mr. Linda R. Dietz, U.S. EPA, re: Summary of recent events and reiteration of EPA's positions on various outstanding issues, 2/12/93.

- P. 308103-308106. A copy of the method detection limits for compounds on-site is attached.
194. Letter to Ms. Linda Dietz, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Review of the Feasibility Study, 3/24/93. P. 308107-308123. Revisions are attached.
  195. Letter to Ms. Linda Dietz, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Submittal and responses to EPA's final comments on the RI/FS Report, 3/31/93. P. 308124-308150. The responses to EPA's final comments are attached.
  196. Proposed Plan, Occidental Chemical Site, Montgomery County, Pennsylvania, 4/93. P. 308151-308171.
  197. Memorandum to Ms. Nancy Rios, U.S. EPA, from Ms. Joan S. Dollarhide, U.S. EPA, re: Inhalation toxicity information for benzene, carbon tetrachloride and 1,2-dichloroethane, 12/15/92. P. 308172-308202. Three papers entitled "Attachment I, Risk Assessment Issue Paper for: Derivation of a Provisional RfC for Benzene (CASRN 71-43-2)"; "Attachment II, Risk Assessment Issue Paper for: Provisional Inhalation RfC for Carbon Tetrachloride (CASRN 56-23-5)"; and "Attachment III, Risk Assessment Issue Paper for: Derivation of a Provisional RfC for 1,2-Dichloroethane," are attached.
  198. Letter to Ms. Linda Dietz, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Response to the Proposed Remedial Action Plan (PRAP), 5/14/93. P. 308203-308206. The comments are attached.
  199. Memorandum to Ms. Linda Dietz, U.S. EPA, from Ms. Nancy Rios, U.S. EPA, re: Review of PRP-generated Human Health Risk Assessment, 6/23/93. P. 308207-308207.
  200. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Jonathan P. Deason, U.S. DOI, re: Preparation of Preliminary Natural Resources Survey (PNRS) and recommendations about the trust resources, 5/25/93. P. 308207a-308223. A report entitled "Technical Analysis of the Occidental Chemical/Firestone Superfund Site" is attached.

201. Memorandum to Ms. Linda Dietz, U.S. EPA, from Ms. Nancy L. Cichowicz, U.S. EPA, re: Review of the draft Record of Decision (ROD), 6/8/93. P. 308224-308224.
202. Memorandum to Ms. Linda Dietz, U.S. EPA, from Mr. Douglas A. Donor, U.S. EPA, re: Comments on the draft ROD, 6/9/93. P. 308225-308228.
203. Memorandum to L. Dietz, U.S. EPA, from Ms. Nancy Rios, U.S. EPA, re: Comments on the draft ROD, 6/11/93. P. 308229-308229.
204. Letter to Ms. Linda Dietz, U.S. EPA, from Mr. David C. Kennedy, PADER, re: Comments on the draft ROD, 6/18/93. P. 308230-308230.
205. Memorandum to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. Joseph W. Kunz, U.S. EPA, re: Comments on the draft ROD, 6/21/93. P. 308231-3308233. Table 9, Selected Action-Specific Potential ARARs for Incinerator, is attached.
206. Memorandum to Ms. Linda R. Dietz, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Request for additional sampling and analysis during the design phase, 6/21/93. P. 308234-308239. A table regarding the Ecological Risk Analysis and technical comments on draft ROD is attached.
207. Memorandum to Ms. Linda Dietz, U.S. EPA, from Mr. Douglas A. Donor, U.S. EPA, re: Comments on the final draft ROD, 6/22/93. P. 308240-308240.
208. Memorandum to Ms. Linda Dietz, U.S. EPA, from Mr. Don Henne, U.S. DOI, re: Comments and recommendations on the draft ROD, 6/23/93. P. 308241-308242.
209. Letter to Mr. Stanley W. Laskowski, U.S. EPA, from Mr. James W. Rue, PADER, re: Conditional concurrence on the EPA ROD, 6/30/93. P. 308243-308244.
210. Establishment of Administrative Record Sheet, Occidental Chemical Corporation site, 6/30/93. P. 308244a-308244a.

- 211. Record of Decision, Occidental Chemical Corporation Site, 6/30/93. P. 308245-308353.
- 212. Letter to Ms. Linda Dietz, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Summary of September 15, 1993 meeting discussing the ROD, 11/1/93. P. 308354-308359. A letter regarding significant changes and additions to the ROD is attached.
- 213. Letter to Mr. Alan F. Weston, Occidental Chemical Corporation, from Ms. Linda Dietz, U.S. EPA, re: Clarification of issues discussed at a September 15, 1993 meeting and response to a November 1, 1993 letter concerning the ROD, 11/30/93. P. 308360-308362.
- 214. Letter to Ms. Barbara Smith, U.S. EPA, from Mr. Alan F. Weston, Occidental Chemical Corporation, re: Request that EPA change the ROD concerning the usage of the onsite Residual Waste Landfill, 3/24/95. P. 308363-308367. Attachment A, a petition for a change in the ROD is attached.
- 215. Letter to Ms. Linda Dietz, U.S. EPA, from Mr. Timothy Cherry, PADER, re: PADER's review and comments on the draft Explanation of Significant Differences (ESD) to the ROD, 5/24/95. P. 308368-308369.
- 216. Letter to Mr. Abraham Ferdas, U.S. EPA, from Ms. Carol R. Collier, PADER, re: Notification of how the ESD affects Pennsylvania ARARs, and concurrence with the ESD, 6/28/95. P. 308370-308371.
- 217. Explanation of Significant Differences, Occidental Chemical Corporation Site, Chester County, Pennsylvania, 9/11/95. P. 308372-308376. A transmittal letter is attached.

V. COMMUNITY RELATIONS/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. Newspaper article entitled "Firestone to Sell 75% of Tire Unit In \$1 Billion Deal with Japanese," The New York Times, 2/17/88. P. 500001-500003.
2. Superfund Fact Sheet for Occidental Chemical Corporation Superfund Site, 2/91. P. 500004-500005.
3. Information, Occidental Chemical/Firestone, (undated). P. 500006-500009. A site sketch is attached.
4. Report: Community Relations Plan, Occidental Chemical Corporation Superfund Site, prepared by Dynamac Corporation, 3/30/92. P. 500010-500045.
5. Transcript, U.S. EPA Public Meeting, Occidental Chemical Site, re: Introduction of the proposed plan for the remediation of the site, 5/4/93. P. 500046-500087.
6. Letter to Ms. Linda R. Dietz, U.S. EPA, from Mr. Gregory E. Prowant, The Township of Lower Pottsgrove, re: Comments on the proposed cleanup alternative, 5/14/93. P. 500088-500089.
7. Letter to Mr. Mervyn Harris, U.S. EPA, from Mr. Thomas J. Harwood, Jr., Borough of Pottstown, re: Comments on the proposed clean-up alternative in regards to the pump and treatment approach, 5/18/93. P. 500090-500092.

SITE SPECIFIC GUIDANCE DOCUMENTS INCLUDED

1. Report: Inhalation Exposures to Volatile Organic Contaminants in the Shower, prepared by Ms. Sarah A. Foster and Mr. Paul C. Chrostowski, ICF-Clement Associates, Inc., 6/21/87-6/26/87.
2. Memorandum to Regional Administrators, Regions I-X, from Mr. Don R. Clay, U.S. EPA, re: Initial guidance on implementing EPA's performance of Risk Assessments, 8/28/90.  
OSWER #9835.15
3. Region III Technical Guidance Manual, Risk Assessment Selecting Exposure Routes and Contaminants of Concern by Risk-Based Screening, prepared by U.S. EPA, 1/93.  
EPA/903/R-93-001

## BIBLIOGRAPHY OF SITE SPECIFIC GUIDANCE DOCUMENTS

1. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, prepared by OSWER/OERR, 10/1/88.  
OSWER #9355.3-01
2. Model Statement of Work for a Remedial Investigation and Feasibility Study Conducted by Potentially Responsible Parties, prepared by OWPE, 6/2/89.  
OSWER #9835.8
3. Interim Guidance on Potentially Responsible Party Participation in Remedial Investigations and Feasibility Studies, prepared by J.W. Porter/OSWER, 5/16/88.  
OSWER #9835.1a
4. A Compendium of Superfund Field Operations Methods, prepared by OERR/OWPE, 12/1/87.  
OSWER #9355.0-14
5. Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses (Draft), prepared by EPA Data Review Work Group, R. Bleyler, Viar and Co., Sample Management Office/HSED, 7/1/88.
6. Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses (Draft), prepared by R. Bleyler, Viar and Co., Sample Management Office, EPA Data Review Work Group, HSED, 2/1/88.
7. Land Disposal Restrictions, prepared by H.L. Longest/Lucero, OERR, 8/11/87.
8. Superfund LDR Guide #1 Overview of RCRA Land Disposal Restrictions (LDRs), prepared by OERR, 7/1/89.  
OSWER #9347.3-01FS
9. Considerations in Ground Water Remediation at Superfund Sites, prepared by OSWER, 10/18/89.  
OSWER #9355.4-03
10. Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites, prepared by OERR, 12/1/88.  
OSWER #9283.1-2

11. CERCLA Compliance With Other Environmental Statutes, prepared by J.W. Porter/OSWER, 10/2/85.  
OSWER #9234.0-2
12. CERCLA Compliance With Other Laws Manual (Draft), prepared by OERR, 8/8/88.  
OSWER #9234.1-01
13. CERCLA Compliance With Other Laws Manual Part II: Clean Air Act and Other Environmental Statutes and State Requirements, prepared by OERR, 8/1/89.  
OSWER #9234.1-02
14. Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual, prepared by OERR, 9/29/89.  
OSWER #9285.7-01a
15. Risk Assessment Guidance for Superfund, Volume II, Environmental Evaluation Manual, prepared by OERR, 3/1/89.  
EPA/540/1-89/001